

**FILED**

**UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO**

IN THE UNITED STATES DISTRICT COURT

DEC 01 2015 *hm*

FOR THE DISTRICT OF NEW MEXICO

**MATTHEW J. DYKMAN  
CLERK**

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

**MATTHEW MARTINEZ, a.k.a. "Goat,"** )

Defendant. )

CRIMINAL NO. CR-15-4276 MCA

Counts 1-3: 21 U.S.C. §§ 841(a)(1)  
and (b)(1)(C): Distribution of  
Heroin.

INDICTMENT

The Grand Jury charges:

Count 1

On or about April 30, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **MATTHEW MARTINEZ**, unlawfully, knowingly, and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 2

On or about May 1, 2015, in Santa Fe County, in the District of New Mexico, the defendant, **MATTHEW MARTINEZ**, unlawfully, knowingly, and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 3

On or about September 16, 2015, in Santa Fe County, in the District of New Mexico, the defendant, **MATTHEW MARTINEZ**, unlawfully, knowingly, and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATIONS

Upon conviction of any offense in violation of 21 U.S.C. § 841, the defendant, **MATTHEW MARTINEZ**, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses.

The property to be forfeited to the United States includes but is not limited to the following:

MONEY JUDGMENT

A sum of money equal to at least \$5,900 in United States currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offense.

SUBSTITUTE ASSETS

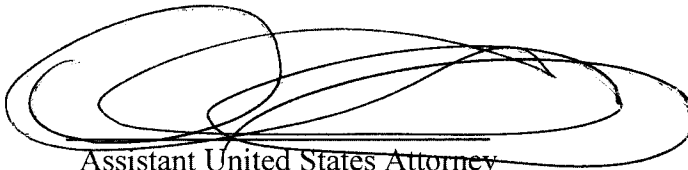
If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke.

Assistant United States Attorney

A small, stylized handwritten mark or signature in black ink, consisting of a few sharp, angular strokes.